

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

United States of America

:

Case No. 13:17cr046

v.

:

Taylor Devaughn White

:

Judge Walter H. Rice

Defendant.

MOTION TO REINSTATE BOND

Now comes the Defendant, Taylor D. White, by and through undersigned counsel, and hereby respectfully requests this Court to Reinstate the Defendant's bond releasing him from confinement at the Butler County Jail and placing him on home confinement and allowing him to leave the home for employment and school purposes. The Defendant respectfully asserts that he was granted authority by this court in the past to seek employment and to be released from home confinement during working hours and was successful in being monitored. Mr. White also submits that he seeks to be employed full-time again and has learned from mistakes in the past and understands the repercussions of his actions.

Most recently, he was employed with Caterpillar Manufacturing. Prior to that job, Mr. White was employed with Green Tokai, Sugar Creek Packing, H Gerstner and Sons, and Fuyao Glass America. In addition, Mr. White asserts that during this time of employment, his child support obligations were being met.

Mr. White is aware that his driving privileges have been suspended by the State of Ohio and that he can not legally drive. Understanding this, he has engaged attorney Steve Strain (#93884) to regain some measure of those privileges, and was in the process of regaining those rights when his bond was revoked.

The Defendant, Taylor D. White, has successfully completed mental health counseling and is of sound mental condition. He has been a lifelong resident of Montgomery County, Ohio and has never been convicted of a felony in the past. Furthermore, Taylor D. White asserts that he has successfully appeared at every previous court proceeding in this case and in any previous misdemeanor case brought against him by the State of Ohio.

Taylor D. White has exhibited a good moral character and has not exhibited any propensity for violence in the past or during his home incarceration period that was ordered by this court.

Therefore, Taylor D. White respectfully requests this court to find, based on the relevant characteristics mentioned above, that he poses no risk of flight or threat of violence to the local community.

Lastly, The Prosecution does not oppose this motion.

WHEREFORE, Taylor D. White hereby requests that this Honorable Court modify the conditions of his bond allowing him the ability to work.

Respectfully Submitted,

/s/ Carlos M. Crawford

CARLOS M. CRAWFORD (0093287)

Attorney for Defendant, Taylor D. White

40 N. Sandusky St., Ste. 202

Delaware, OH 43015

Phone: 614-356-7565

Email: carlos@thecrawfordfirm.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion was served by email delivery on this 11th day of February, 2019, upon the following counsel of record via email.

AUSA Sheila Lafferty

/s/ Carlos M. Crawford

Carlos M. Crawford (#0093287)